

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>Edna Leon Rosario</b>	<b>:</b>	<b>Chapter 13</b>
		<b>:</b>	
	<b>Debtor</b>	<b>:</b>	
<b>Midfirst Bank</b>		<b>:</b>	
<b>Movant</b>		<b>:</b>	<b>Bankruptcy Case Number</b>
		<b>:</b>	<b>15-17196 AMC</b>
		<b>:</b>	

**Debtor's Response to the Motion of Midfirst Bank  
for Relief from the Automatic Stay**

Debtor, **Edna Leon Rosario**, by and through his counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Relief of Midfirst Bank and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
4. ADMITTED.
5. ADMITTED.
6. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Debtor is now current on the mortgage.
7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
8. DENIED. Answering Debtor denies the allegations contained in this paragraph as

conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Debtor has cured any arrearage.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

**WHEREFORE**, Debtor, **Edna Rosario**, requests this Honorable Court deny the motion of Midfirst Bank for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor